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UNITED STATES DISTRICT COURT
4
DISTRICT OF NEVADA

5 WAYAN GARVEY, *on behalf of himself and all* Case No.: 2:23-cv-00920-APG-DJA
6 *others similarly situated,*

7 Plaintiff,

8 v.
9 KELLER WILLIAMS REALTY, INC. and
10 BRITNEY GAITAN,

11 Defendants.

12
**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT KELLER WILLIAMS
TO FILE RENEWED MOTION TO
DISMISS**

13 [FIRST REQUEST]

14 Plaintiff WAYAN GARVEY (“Plaintiff”), by and through his counsel Craig K. Perry,
15 Esq. of CRAIG K. PERRY & ASSOCIATES, Chris R. Miltenberger, Esq. of THE LAW
16 OFFICE OF CHRIS R. MILTENBERGER, PLLC, and Eric H. Weitz, Esq. and Max S. Morgan,
17 Esq. of THE WEITZ FIRM LLC, and Defendant KELLER WILLIAMS REALTY, INC., by and
18 through its counsel Michael Ayers, Esq. of QUINTAIROS, PRIETO, WOOD & BOYER, P.A.
19 and Todd P. Stelter, Esq. of HINSHAW & CUBLERSTON LLP (“KWRI”), hereby stipulate as
follows:

20 1. On May 2, 2024, the Court entered its Order Denying KWRI’s Motion to Dismiss
21 Without Prejudice Pending jurisdictional Discovery (ECF No. 50).

22 2. In the May 2, 2024, Order, the Court granted Plaintiff an additional ninety (90)
23 days from the date of thereof within which to conduct jurisdictional discovery, until July 31,
24 2024 (ECF No. 50).

25 3. In the May 2, 2024, Order, the Court also granted KWRI twenty-one (21) days
26 from the date of the expiration of the jurisdictional discovery period date of July 31, 2024, within
27 which to file a renewed motion to dismiss, until August 21, 2024 (ECF No. 50).

28 4. On July 30, 2023, the Court entered its Order (ECF No. 63) granting in part and

1 denying in part the Stipulated Protective Order (ECF No. 60).

2 5. On July 31, 2024, the Court entered its Order granting Plaintiff forty-two (42)
3 additional days from the date the Court issued an order with respect to the Stipulated Protective
4 Order within which to conduct jurisdictional discovery, until September 10, 2024 (ECF No. 64).

5 6. In the July 31, 2024, Order, the Court granted KRWI twenty-one (21) additional
6 days following the expiration of the extended jurisdictional discovery period to file its renewed
7 Motion to Dismiss, until October 1, 2024 (ECF 64).

8 7. KRWI's counsel unexpectedly had to attend a wake and funeral of a family
9 member this week and also was required to travel to and from Minnesota for a court-ordered
10 private mediation in a case in the United States District Court for the District of Minnesota

11 8. As a result of these unexpected events, KRWI requested Plaintiff to allow it one
12 (1) additional week within which to file its renewed Motion to Dismiss, until October 8, 2024.

13 9. Accordingly, Plaintiff and KRWI hereby stipulate to extend KRWI's deadline to
14 file its renewed Motion to Dismiss in this matter until and including October 8, 2023.

15 This first request for extension of time for KRWI to file its renewed Motion to Dismiss
16 is being made in good faith and not for the purpose of undue delay. No further extensions are
17 contemplated.

18 **IT IS SO STIPULATED.**

19 DATED this 1st day of October, 2024.

19 DATED this 1st day of October, 2024.

20 **CRAIG K. PERRY & ASSOCIATES**

20 **QUINTAIROS, PRIETO, WOOD &**
21 **BOYER, P.A.**

22 By: /s/ Craig K. Perry
23 Craig K. Perry, Esq.
24 Nevada Bar No. 3786
25 2300 W. Sahara Ave., #800
26 Las Vegas, NV 89102
27 Tele: 702-228-4777
28 *Attorneys for Plaintiff*
 WAYAN GARVEY

22 By: /s/ Michael Ayers
23 Michael Ayers, Esq.
24 Nevada Bar No. 10851
25 3740 Lakeside Dr., Ste. 202
26 Reno, NV 89509
27 Tele: 775-322-4697
28 *Attorneys for Defendant*
 KELLER WILLIAMS REALTY, INC.

1 DATED this 1st day of October, 2024.
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4 **HINSHAW & CULBERTSON LLP**
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6

7 By: /s/ Todd P. Stelter
8 Todd P. Stelter, Esq.
9 *Admitted Pro Hac Vice*
10 151 N. Franklin St., Ste. 2500
11 Chicago, IL 60606
12 Tele: 312-704-3966
13 *Attorneys for Defendant*
14 *KELLER WILLIAMS REALTY, INC.*
15

16 **ORDER**
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18 The **STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANT**
19 **KELLER WILLIAMS TO FILE RENEWED MOTION TO DISMISS** up to and including
20 October 8, 2024, is so ORDERED AND ADJUDGED.
21

22 DATED: October 2nd, 2024
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25

26 UNITED STATES MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this date, the foregoing was electronically filed with the Clerk of
3 the Court using the CM/ECF System and through that service, a copy was sent with e-notice to
4 all parties.

5 Dated: September 27, 2024

6 _____
7 */s/ Christine L. Miller*
8 An Employee of QUINTAIROS,
9 PRIETO, WOOD & BOYER, P.A.
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